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MEMO ENDORSED

December 2, 2021

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VIA ECF

The Honorable Colleen McMahon
U.S. District Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Screen Actors Guild – American Federation of Television and Radio Artists,*
New York Local v. New York Public Radio
Case No. 1:21-cv-04972-CM-RWL [rel. 1:21-cv-5882]

OK
Colleen McMahon
12/3/2021

Dear Judge McMahon:

We represent Defendant New York Public Radio in the above-referenced matter, and write on behalf of both parties. To allow additional time for continued settlement discussions, the parties request that the Court extend (1) the parties' deadline to submit additional authority pursuant to the Court's November 9, 2021 Order (ECF No. 28) from December 7, 2021 until January 7, 2022, and (2) the parties' deadline to exchange initial disclosures from December 29, 2021 until January 28, 2022.

The parties continue to engage in productive settlement discussions, and therefore continue to believe that it would be most efficient to progress towards settlement instead of incurring further litigation expenses at this time.

This is the third extension request for each party: on August 12, 2021, the Court granted the parties' letter request to extend Defendant's deadline to reply in support of its motion to dismiss and Plaintiff's deadline to reply in support of its cross-motion to compel arbitration (*see* ECF No. 25), and on November 12, 2021 the Court granted the parties' letter request for an extension of the same deadlines subject to the instant request (ECF No. 36). Neither extension sought in this request will affect any other scheduled dates.

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Respectfully submitted,

/s/ Wendy C. Butler

Wendy C. Butler

cc: Olivia Singer
Susan Davis
Megan Shaw